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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S COMPLIANCE
WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-00000A-97-0238

**QWEST CORPORATION'S RESPONSE TO
AT&T'S COMMENTS ON DRAFT FINAL REPORT**

Qwest Corporation (Qwest) hereby submits its Response to AT&T's Comments on Draft Final Report (AT&T's Comments).

Qwest is compelled to respond to AT&T's Comments because the accusatory tone of those comments contravenes the spirit of productive collaboration that has become the hallmark of this proceeding.¹ While much of AT&T's Comments repeats AT&T's now-familiar refrains, they also introduce a new level of invective that falls below the acceptable minimum level of professional courtesy.

The CLECs, the ACC, the vendors, and Qwest have all invested significant time and effort over the past two years in the ACC's test of Qwest's operational support systems (OSS), including hundreds of hours in face-to-face meetings, and thousands of hours reviewing and commenting on various documents. While the parties have had

many disagreements throughout that time, all parties have generally attempted to articulate their views in a constructive manner and to listen to differing points of view. As a result, the parties have reached agreement on hundreds of issues.

In order to provide for the early and efficient consideration of the parties' differing views and to avoid leaving substantive issues to be addressed at the very end of the proceeding, the TAG agreed that interim reports would be issued and a series of interim workshops would be held as those reports were issued. All parties were afforded -- and AT&T availed itself of -- every opportunity to submit comments and questions regarding any issue at every step of the process. AT&T's Comments on the draft final report represent a marked departure from the generally civilized presentation of concerns and questions in this proceeding.

As in the past, AT&T complains in its comments on the draft final report that AT&T interprets MTP and TSD provisions differently than CGE&Y and that AT&T disagrees with CGE&Y's conclusions. This time, however, AT&T's Comments include statements and terms that rise to the level of attacks on CGE&Y's integrity. By way of illustrative example, AT&T accuses CGE&Y of "invent[ing]" factors and analyses;² executing its obligations in a "half-hearted"³ and "negligent" manner;⁴ "very obviously cho[osing] to do a minimal effort;"⁵ and "consciously ignor[ing]" factors and issues.⁶ AT&T's shrill crescendo culminates in the following statement: "The shocking and

¹ This response is limited to addressing that tone and does not address the substance of the comments. In accordance with the Arizona Corporation Commission (ACC) Staff's prior instructions, Qwest will address substantive issues in its post-workshop brief.

² AT&T's Comments at 14, 83, & 87.

³ AT&T's Comments at 24.

⁴ AT&T's Comments at 25.

⁵ AT&T's Comments at 24-25.

disappointing inaccurate information contained in this [conclusions] section must promptly be exposed and expunged."⁷

These comments clearly constitute unwarranted and unfair attacks on CGE&Y's professional integrity. Further -- and perhaps more destructively -- these comments demonstrate an utter lack of professional courtesy for CGE&Y and the other participants in this process.

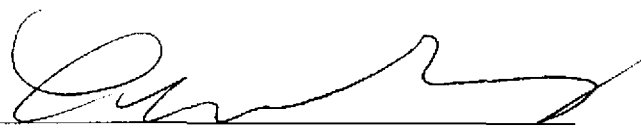
All of the participants in this proceeding have had the virtually unlimited ability to raise any issue at any stage of this process, beginning with the negotiation of the MTP and continuing through the workshops held on each interim draft final report. Now that the test has ended -- and the parties have already raised virtually all substantive issues in prior workshops -- AT&T appears to have resorted to gratuitous and unacceptable tactics in an attempt to further delay this proceeding.

Qwest appreciates the significant contributions of all of the TAG participants, including AT & T, in designing and executing a rigorous and comprehensive test of Qwest's systems with an unprecedented level of openness and collaboration. As the process comes to a close, Qwest trusts that the parties will exhibit the same level of professional respect and courtesy they have to date.

⁶ AT&T's Comments at 58.

⁷ AT&T's Comments at 83.

Respectfully submitted this 31st day of January, 2002.



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